



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NEW YORK 10007

DANIEL M. BRAUN
Senior Counsel
dbraun@law.nyc.gov
Phone: (212) 356-2659
Fax: (212) 356-1148

By ECF

August 5, 2022

Honorable Coleen McMahon
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Sierra, et al. v. City of New York, et al.*, 20-cv-10291 (CM)(GWG)
Wood v. City of New York, et al., 20-cv-10541 (CM)(GWG)

Your Honor:

I am a Senior Counsel in the office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and one of the attorneys representing Defendants in the above referenced matter. On July 22, 2022 (Dkt nos. 686, 687, 688, 689, 690, and 692), the *Sierra* and *Wood* plaintiffs filed a motion for leave to file an Amended and Consolidated Complaint. By letter dated August 4, 2022 (Dkt. No. 715), defendants requested with plaintiffs' consent an extension of time from August 5, 2022 until August 12, 2022 to file their opposition to plaintiffs' above-referenced motion for leave to amend and consolidate the *Sierra* and *Wood* complaints. The Court has yet to rule on said request. However, the undersigned will need to be out of the country beginning mid-next week, and other defense counsel will be away as well, during various portions of August. As the Court has now So Ordered the parties' Stipulation and Order (Dkt. 718) for a 60-day stay period, plaintiffs consent to defendants having until September 2, 2022 to file their opposition to plaintiffs' above-referenced motion for leave to amend and consolidate the *Sierra* and *Wood* complaints. Consequently, defendants write herein to modify their letter motion at Dkt. 715, and instead respectfully request with plaintiffs' consent that the deadline to file an opposition to the above-referenced *Sierra-Wood* motion beginning at Dkt. 686 be extended until September 2, 2022.

This is defendants' first request for such a modification. The above-referenced extension would require a corresponding extension of time for plaintiffs to file their reply papers. Upon information and belief, this extension would not impact any other scheduled deadlines in this matter.

Thank you for your consideration herein.

Respectfully submitted,

Daniel Braun /s/

Daniel Braun
Senior Counsel
Special Federal Litigation Division

cc: ALL COUNSEL (via ECF only)